

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**JESUS CANALES**  
Plaintiff

V.

**ALLSTATE TEXAS LLOYD'S**  
Defendant

§  
§  
§  
§  
§  
§  
§

**CASE NUMBER 5:15-cv-213**  
**JURY**

**AGREED RULE 41(a) STIPULATION OF DISMISSAL WITH PREJUDICE**

Plaintiff, Jesus Canales and Defendant, Allstate Texas Lloyd's hereby stipulate to the voluntary dismissal with prejudice of this matter, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

On July 29, 2015, Plaintiff filed the instant suit in the 49<sup>th</sup> Judicial District Court of Webb County, Texas. Defendant successfully removed this case to this Court on September 23, 2015.

Plaintiff moves to dismiss this suit. Defendant, who served its original answer in state district court on September 9, 2015, agrees to the dismissal.

This case is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.

A receiver has not been appointed in this case.

This case is not governed by any federal statutes that requires a court order for dismissal of the case.

Plaintiff has not previously dismissed any federal or state court suit based on or

including the same claims as those presented in this case.

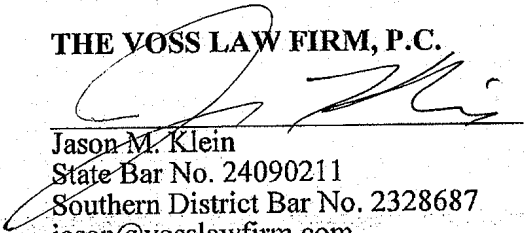
This dismissal is WITH prejudice.

Therefore, Plaintiff's claims against Defendant Allstate Texas Lloyd's are hereby dismissed with prejudice, with each party to bear its own costs, if any.

SO STIPULATED, this the 28<sup>th</sup> day of February, 2017.

Respectfully submitted,

**THE VOSS LAW FIRM, P.C.**



Jason M. Klein  
State Bar No. 24090211  
Southern District Bar No. 2328687  
[jason@vosslawfirm.com](mailto:jason@vosslawfirm.com)

**ATTORNEY-IN-CHARGE**

**OF COUNSEL:**

Bill L. Voss  
State Bar No. 24047043  
Southern District Bar No. 602663  
Scott G. Hunziker  
State Bar No. 24032446  
Southern District Bar No. 38752  
**THE VOSS LAW FIRM, P.C.**  
26619 Interstate 45 South  
The Woodlands, Texas 77380  
Telephone: (713) 861-0015  
Facsimile: (713) 861-0021  
[bill.voss@vosslawfirm.com](mailto:bill.voss@vosslawfirm.com)  
[scott@vosslawfirm.com](mailto:scott@vosslawfirm.com)

And

**GOLDMAN & ASSOCIATES, PLLC**

Airport Center

10100 Reunion Place, Suite 800


San Antonio, Texas 78216

Telephone: (210) 340-9800

Facsimile: (210) 340-9888

E-Mail: [Larry@ljglaw.com](mailto:Larry@ljglaw.com)

[Sarah@ljglaw.com](mailto:Sarah@ljglaw.com)

  
LARRY J. GOLDMAN

"Attorney in Charge"

Federal Bar No. 341

Texas State Bar No. 08093450

SARAH R. MINTER

"Of Counsel"

Southern District of Texas

Federal ID No. 2311192

Texas State Bar No. 24077688

ATTORNEYS FOR DEFENDANT,  
ALLSTATE TEXAS LLOYDS

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Defendant's counsel, the non-movant, regarding the Parties' Agreed Rule 41(a) Stipulation Of Dismissal With Prejudice and Defendant's counsel agrees to the granting of the motion.



JASON M. KLEIN

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing has been forwarded to the following counsel of record in compliance with the Federal Rules of Civil Procedure on this 28<sup>th</sup> day of February, 2017.

Mr. Larry J. Goldman  
Ms. Sarah R. Minter  
GOLDMAN & ASSOCIATES, PLLC  
10100 Reunion Place, Suite 800  
San Antonio, Texas 78216



JASON M. KLEIN